

**UNITED STATES DISTRICT COURT
DISTRICT OF MARYLAND**

Federal Trade Commission

Plaintiff,

v.

Innovative Marketing, Inc., *et al.*

Defendants,

AND

Maurice D'Souza

Relief Defendant.

CIVIL NO. RDB 08-CV-3233

**CONSENT MOTION FOR 60 DAY STAY OF PROCEEDINGS
TO PURSUE SETTLEMENT IN PRINCIPLE**

Plaintiff, the Federal Trade Commission ("FTC" or "Commission"), and Defendants Marc D'Souza and Maurice D'Souza hereby request that the Court stay this case as to all parties for sixty (60) days so that they may pursue a settlement. Defendant Kristy Ross does not oppose the relief sought in this motion.

1. On May 26, 2010, the FTC, Marc D'Souza and Maurice D'Souza reached a settlement in principle that would resolve all of the FTC's claims against the D'Souzas.
2. The proposed settlement requires the D'Souzas to secure funds that are not immediately available, and will take time to obtain.
3. To allow the D'Souzas sufficient time to secure the settlement funds, the FTC, and the D'Souzas move this Court to enter a 60 day stay of proceedings. Without the stay, the parties would be forced to incur substantial costs while awaiting the funds transfer, including the cost of conducting the remaining depositions in this case as well as

summary judgment briefing. These substantial costs could harm the prospects of a settlement.

4. Although Kristy Ross is not a party to the settlement in principle, a 60 day stay of proceedings will impose no hardship upon her, as evidenced by the fact that she does not oppose the relief sought in this motion.
5. Granting the requested stay will also serve the interests of judicial economy. Allowing the parties the time to pursue their agreement in principle is likely to result in the settlement of this matter as to defendants Marc D'Souza and Maurice D'Souza. As a result, the issues for summary judgment and, if necessary trial, in this large and complex case are likely to be substantially narrowed.
6. Granting the stay will also provide the FTC and Kristy Ross with additional time to discuss the possibility of settlement.

WHEREFORE, the FTC, Marc D'Souza and Maurice D'Souza, respectfully request the Court stay this case as to all parties for a period of sixty (60) days.

Dated: May 27, 2010

Respectfully submitted:

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ORDER GRANTING JOINT MOTION FOR 60 DAY STAY OF PROCEEDINGS

Upon consideration of the parties' Joint Motion for 60 Day Stay of Proceedings To Pursue Settlement in Principle, and finding good cause exists, it is this _____ day of May, 2010, hereby:

ORDERED that this matter shall be stayed as to all parties for 60 days from the date of this Order.

IS IT SO ORDERED THIS ____ OF MAY, 2010:

Richard D. Bennett
United States District Judge

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CERTIFICATE OF SERVICE

I hereby certify that on May 27, 2010, I caused a true and correct copy of the foregoing to be served via the Court's electronic filing system upon:

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